

SCANNED AT MENARD and E-mailed
 9-22-17 by PS 26 pages
 date Initials No.

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

HARDING LOVETT

Plaintiff/Petitioner(s)

Jarrett K. Neff / And / ESCCSO 3
Beth Nester / And / ESCCSO 3
County of St. Clair
St. Clair County Sheriff's Dept.
 Defendant/Respondent(s)

Case Number: 17-1023-JPG
 (Clerk's Office will provide)

☒ CIVIL RIGHTS COMPLAINT
 pursuant to 42 U.S.C. §1983 (State Prisoner)
☐ CIVIL RIGHTS COMPLAINT
 pursuant to 28 U.S.C. §1331 (Federal Prisoner)
☐ CIVIL COMPLAINT
 pursuant to the Federal Tort Claims Act,
 28 U.S.C. §§1346, 2671-2680, or other law

I. JURISDICTION

St. Clair Co.
HARDING LOVETT
 Plaintiff: P.O. Box 1000 MENARD IL, 62259 I.D.A-90919 #

A. Plaintiff's mailing address, register number, and present place of
 confinement. P.O. Box 1000 " " " "

Defendant #1:

B. Defendant JARRETT K NEFF / ESCCSO 3 is employed as
 (a) (Name of First Defendant)

St. Clair County Sheriff
 (b) (Position/Title)

with St. Clair County Sheriff's Dept.
 (c) (Employer's Name and Address)

700 N 5th St. BELLEVILLE IL, 62220

At the time the claim(s) alleged this complaint arose, was Defendant #1
 employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain:

At the time he was a St. Clair County Sheriff
on Sept. 30th, 2015

Defendant #2:

C. Defendant Beth Nester / AND ESCC SA 03 is employed as

(Name of Second Defendant)

State Attorney for St. Clair County IL
(Position/Title)

with State Attorney Office St. Clair County
(Employer's Name and Address)

10 Public Square Belleville IL 62220

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

ON August 11th, 2016 she was a state attorney who conducted a proceeding, that was not in accordance with the law.

Additional Defendant(s) (if any): Defendants for unconditional strip search or illegal strip search.

D. Using the outline set forth above, identify any additional Defendant(s).

1) St. Clair County Sheriff's Department
700 N. 5th St. Belleville IL 62226

2) County of St. Clair located at
10 Public Square Belleville IL 62220

3) St. Clair Co Sheriff's: SHANE BROWN #827

4) Kurt Eversman

5) Kevin Kocurek

6) William Costo

7) Mathew Lindsey

II. PREVIOUS LAWSUITS

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☐ Yes ☒ No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:
Plaintiff(s): NONE

Defendant(s):

NONE

2. Court (if federal court, name of the district; if state court, name of the county): NONE

3. Docket number: NONE

4. Name of Judge to whom case was assigned: NONE

5. Type of case (for example: Was it a habeas corpus or civil rights action?): NONE

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): First-time EVER filing a lawsuit

7. Approximate date of filing lawsuit: NONE

8. Approximate date of disposition: NONE

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? *NONE* ☐ Yes ☐ No
- C. If your answer is YES, *NONE*
1. What steps did you take?

2. What was the result? *NONE*

-
- D. If your answer is NO, explain why not.

I don't have a grievance with this institution.

- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☒ No

- F. If your answer is YES,
1. What steps did you take? *NONE*

2. What was the result? *NONE*

- G. If your answer is NO, explain why not. *No Explanation*

- H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

I don't have a grievance procedure going on. This is a complaint against the corruption of St. Clair County judicial system and Sheriff's Department.

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments of citations. If you wish to present legal arguments or citations, file a separate memorandum of law. (If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph.) If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

1) PLAINTIFF HARDING LOVETT

V

DEFENDANTS

- 2) St. Clair County Sheriff JARRETT K. NETT
- 3) BETH NESTER St. Clair County State Attorney
- 4) STATE ATTORNEY OFFICE OF St. Clair County
- 5) County of St. Clair AND the St. Clair Co. Sheriff dept.
- 6) County of St. Clair
- 7) St. Clair County Sheriff department, AND the following members of the St. Clair County Sheriff dept.
- 8) SHANE BROWN #827
- 9) KURT EVERSMAN
- 10) KEVIN KOCUREK
- 11) WILLIAM CASTO
- 12) MATTHEW LINDLEY

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I am seeking \$15,000 in punitive and damages against JARRETT K. NEFF and \$15,000 each for 5 following SHERIFFS, SEE ATTACH LETTER, that violated my civil rights on SEPT. 30th, 2015. I am also seeking three millions against the (SCCSD) who members violated my civil rights with the Sept. 30th, 2015, and the illegal incarceration, that have cause severe suffering, mental anxiety, mental confusion, constant and nagging suicide thoughts and irreversible nerve damage in both hands that no medical operation can repair.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: Sept. 10th, 2017
(date)

P.O. Box 1000
Street Address

MENARD IL, 62259
City, State, Zip

Harding Lovett
Signature of Plaintiff

HARDING LOVETT
Printed Name

A-90919
Prisoner Register Number

Signature of Attorney (if any)

Arden Lovett
Plaintiff

v
Defendant
Beth Nester

- 1) On August 11th, 2016 Beth Nester of the St. Clair County State Attorney Office violated my Civil Rights when she knowingly and intentionally obstructed justice by arranging and orchestrating an illegal proceeding that produce illegal grand jury transcripts.
- 2) On August 11th, 2016 Beth Nester violated my Civil Right, when she use deceptive measures in an attempt to cover up the incompetent investigation of Jarrett K. Nell of the St. Clair County Sheriff's Department.
- 3) On August 11th, 2016 Beth Nester went to great length to violate my Civil Rights when she use extreme negligent and malicious prosecution to encourage and conspire with St. Clair County Sheriff Mathew Lindley in an illegal examination that manufactured illegal grand jury transcripts without a grand jury being in attendance.
- 4) On August 11th, 2016 Beth Nester were not in accordance with the law on my Civil and Constitutional Rights when she interfered and undermine the legal process of justice by staging a proceeding with a grand jury member or a grand jury panel being present.

- 5) In closing of Beth Nester purported grand jury examination, she ask a question on page 11, line 20. (SEE transcripts of August 11th, 2016)
- 6) She ask were there any questions in regard to Matthew Lindie testimony?
- 7) She wasn't talking to anyone in specific or particular, SO, who answer that question she had just ask -- WERE THE VERY PERSON WHO ASK THE QUESTION, BETH NESTER.
- 8) Beth Nester and (SCCSAO) violated my civil rights by an prosecution that wasn't in accordance to the rule of law, I WERE NEVER indicted for this illegal arrest AND illegal imprisonment, and there's nothing in there prosecution to prove that I was officially indicted. CASE # 15 CF-1181
15 CF-1181

Sign. Harding Lorett
DATE September 10th, 2017

I've BEEN held unconstitutional for almost two years now, when the case should have been dismiss base on the Powell Amendment at the preliminary hearing, but I WAS DENIED A preliminary hearing, BECAUSE OF THREE falsely indictment dates. THE COLLUSION BETWEEN THE (SCCS) Lorett K. Nett AND THE (SCCLSD) AND BETH NESTER AND THE (SCCSAO) ARE RESPONSIBLE FOR THIS UNCONSTITUTIONAL ARREST ON SEPT. 30th 2015 AND WRONGFUL IMPRISONMENT.

Page 1 of 2

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I AM SEEKING \$15,000 IN PUNITIVE AND DAMAGES AGAINST BETH NESTER WHO VIOLATED MY CIVIL RIGHTS WHEN I WAS OBSTRUCTED JUSTICE AND USE EXTREME NEGLIGENT AND MALICIOUS PROSECUTION ON AUGUST 11TH, 2016 IN A JAIL PROCEEDING THAT PRODUCE ILLEGAL GRAND JURY TRANSCRIPTS WITHOUT A GRAND JURY PANEL BEING PRESENT. I AM ALSO SEEKING THREE MILLIONS IN COMPENSATORY DAMAGES AGAINST THE ST. CLAIR COUNTY STATE ATTORNEY OFFICE, WHO ENCOURAGED BETH NESTER OF HER ILLEGAL ACTIONS, AND DID NOTHING BUT STOOD BY AND WATCH HER COMMIT CIVIL RIGHTS VIOLATIONS. THE UNCONSTITUTIONAL CONFINEMENT OF NOT BEING OFFICIALLY INDICTED HAVE CAUSE SEVERE SUFFERING AND REMENDOUS AMOUNT OF DEPRESSION THAT HAVE CAUSE NERVE DAMAGES FOR OVER A YEAR. THE SIGNIFICANT AMOUNT OF STRESS THAT I'M STILL EXPERIENCING EVERYDAY HAVE CAUSE THIS NERVE DAMAGE.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on:

SEP. 10TH, 2017
(date)

Signature of Plaintiff

P.O. BOX 1000

Street Address

HARDING LOVELL

Printed Name

MEVARD IL 62259

City, State, Zip

A 90919

Prisoner Register Number

Signature of Attorney (if any)

ARDING LOVETT
Plaintiff

✓
Defendant

JARRETT K. NEFF

- 1) ON SEPT. 29th, 2015 ST. CLAIR COUNTY SHERIFF JARRETT K. NEFF FALSELY ACCUSE ME OF BREAKING THE LAW THREE DIFFERENT TIMES IN HIS AFFIDAVIT TO OBTAIN A SEARCH WARRANT.
- 2) ON SEPT. 29th, 2015 (SCCS3 JARRETT K. NEFF WERE NOT IN ACCORDANCE WITH THE LAW OR MY CIVIL RIGHTS WHEN HE OBSTRUCTED JUSTICE BY SWEARING TO FALSE STATEMENT IN HIS AFFIDAVIT THAT HE KNEW WERE NOT TRUE. SEVERAL ASPECT OF HIS INVESTIGATION MADE NO SENSE, INCLUDING HIS THEORY OF ME BREAKING THE LAW THREE TIMES AND WITHOUT BEING ARRESTED.
- 3) ON SEPT. 29th, 2015 (SCCS3 JARRETT K. NEFF VIOLATED MY CIVIL RIGHTS BY USING FALSE STATEMENT, FALSE INFORMATION AND FALSE PRETENSES TO OBTAIN A SEARCH WARRANT THAT LACKED PROBABLE CAUSE.
- 4) ON SEPT. 30th, 2015 AT 221 N. 44 ST IN BELLEVILLE IL, 62226 Apt. #4 AT APPROXIMATELY 10:15 A.M. JARRETT K. NEFF AND MEMBERS OF THE (SCCS3 USE THEM SAME FALSE PRETENSES TO VIOLATE MY CIVIL RIGHTS ILLEGALLY ENTERED MY APARTMENT WITHOUT PROBABLE CAUSE.
- 5) ON SEPT. 29th, 2015 (SCCS3 JARRETT K. NEFF VIOLATED MY CIVIL RIGHTS WHEN HE SWORE AND PROVIDED FALSE INFORMATION IN HIS AFFIDAVIT THAT NEVER CONTAIN ANY EVIDENCE TO SUPPORT A SEARCH FOR SEPT. 30th, 2015 AT 221 N. 44 ST, BELLEVILLE IL, 62226 Apt. #4

- 6) ON SEPT. 30th, 2015 JARRETT K. NETT and members of the St. Clair County Sheriff's Dept. violated my Civil Rights when they illegally ENTERED my apartment and ARRESTED ME without a valid SEARCH WARRANT. The arrest of SEPT. 30th, 2015 comes from an UNREASONABLE SEARCH AND SEIZE OR from the doctrine fruits of the poisonous tree.
- 7) ON OCT. 16th, 2015 JARRETT K. NETT violated my Civil Rights when he went to great length to use illegal methods to falsify his investigation by CREATING EVEN MORE FALSE INFORMATION to further his report. AFTER REVIEWING A COPY of his investigation, will be his own demise. (SEE INVESTIGATION 3)
- 8) ON OCT. 16th, 2015 JARRETT K. NETT stated in his report that he was the testifying witness for the grand jury, which is far from the truth. And which is violation of my Civil Rights.
- 9) ON OCT. 16th, 2015 JARRETT K. NETT went to the EXTREME to violate my Civil Rights when he sign and forge, of this NON EXISTENT person by the name Gloria Clark who he claim were the grand jury foreman, which is also far from the truth. THERE WERE NEVER NO grand jury foreman by the name of Gloria Clark, I'll get to that later.
- 10) ON OCT. 16th, 2015 the St. Clair County State Attorney Office violated my civil rights by interfering with my due process right, and by denying me a preliminary hearing that I was schedule to have that day on OCT. 16th, 2015 I was informed by the St. Clair County State Attorney, and that I will NOT be having a preliminary hearing.

11) The St. Clair County State Attorney office had three different indictment dates, starting with Oct. 9th, 2015, Oct. 16th, 2015 and some ten months later on August 11th, 2016. And on neither date were I actually indicted and even now I'm still not indicted and I been held unconstitutional for almost two years now. See investigation report for Oct. 16th, 2015 indictment. And review illegal transcripts from August 11th, 2016, it will indicate the other two indictment dates.

12) Finally, There was a hearing on a motion to quash arrest and suppress illegal seize evidence on August 11th, 2016. I was pro se on that date. I ask Jarrett K. Neff several questions during the proceeding, and one of the questions I ask him. Did he ever observe during his undercover twenty-one day window of opportunity investigation witness me break any law or laws in the state of IL, and his answer was no. At that moment the case should have been dismissed, because Jarrett K. Neff contradicted and void everything in his investigation that he once falsely accused me of, which were the three counts of unlawful delivery of a control substance in his affidavit on Sept. 29th, 2015. Consequently on the following day Sept 30th, 2015, Jarrett K. Neff and members of the St. Clair County Sheriff's Dept. violated my civil rights by illegally entering my apartment without a valid search warrant, throwing me against the wall, searching me, then handcuffing me and then unconstitutional arresting me without genuine probable cause.

Sign. Harding Lovett
Date Sept. 10th, 2017



St. Clair County Sheriff's Department
700 N. 5th Street
Belleville, IL. 62220
(618) 277-3504
www.sheriff.co.st-clair.il.us



DRUG TACTICAL UNIT
Supplemental Report

Defendant

Date: 09/30/2015

Investigator: (Shane Brown #827)

Case #: 2015-2040-00024

Complaint #: 15-03512

Offense: Unl Poss Cont Sub w/ Int
UUW Felon

Victim: State of Illinois

Suspect: Harding Lovett
Nicole L. Green

5 ILCS 140/7 (1)(b)

Report: Search Warrant Execution

Case Status: Cleared by Arrest

Offense Date: 09/30/2015

On 09/30/2015 at approximately 1015 hours, I, Investigator Shane Brown, and the following members of the St. Clair County Drug Tactical Unit (DTU);

Defendants
Lieutenant Kurt Eversman
Investigator Jarrett Neff
Investigator Kevin Kocurek
Investigator William Casto
Investigator Matthew Lindley

executed a search warrant at;

5 ILCS 140/7 (1)(b)

While executing the search warrant;

Harding Lovett

Harding Lovett
Plaintiff

V

St. Clair County
Sheriff Dept.

And 1) ON SEPT. 30th, 2015 the St. Clair County Sheriff Department
County of St. Clair violated my civil rights when they illegally strip search me
in the St. Clair County jail at 700 N. 5th St. in St. Clair County,
IL, 62220.

2) ON NOV. 30th, 2016 the St. Clair County Sheriff Department
violated my civil rights again when they illegal strip search
me in the St. Clair County jail located at 700 N. 5th St. in
Belleville IL, 62226

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information and belief, that
this complaint is in full compliance with RULE 11(A) AND 11(B)
of the federal rules of civil procedure. The undersigned also
recognizes that failure to comply with RULE 11 may result
in sanctions.

Date Sept. 10th, 2017

Signature of plaintiff Harding Lovett

Address P.O. Box 1000

City, State and Zip

Print Name Harding Lovett

Menard IL, 62259

Register Number A-90919

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I AM SEEKING THREE MILLIONS FROM THE COUNTY OF ST. CLAIR, AND THREE MILLIONS FROM THE OFFICE OF THE SHERIFF OF ST. CLAIR COUNTY. RELIEF FOR VIOLATION OF THE F.O.I.A. BY THE ST. CLAIR COUNTY STATE ATTORNEY OFFICE AND THE ST. CLAIR COUNTY SHERIFF DEPT. WOULD BE \$10,000 EACH FOR VIOLATING THE BASIC AND FUNDAMENTAL RULES OF LAW, AND CIVIL RIGHTS

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on:

Sept. 10th, 2017
(date)Harding Lovett
Signature of Plaintiff

P.O. Box 1000

Street Address

Harding Lovett
Printed NameMENARD IL, 62259
City, State, ZipA-90919
Prisoner Register Number_____
Signature of Attorney (if any)

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

**If You Were Strip-Searched During Admission into the Cook County Jail
And You Submitted a Valid Claim Form in the *Young v. County of Cook* Settlement,
You Will Receive Additional Money**

A federal court authorized this notice. This is not a solicitation from a lawyer. You are not being sued.

- In 2010, a settlement of a class action lawsuit entitled *Young v. County of Cook*, No. 06-CV-552 (N.D. Ill.), involved approximately 300,000 pre-trial detainees who were strip-searched upon intake into Cook County Jail between January 30, 2004 and March 30, 2009. The Defendants in that case were the County of Cook ("County") and the Office of the Sheriff of Cook County ("Sheriff").
- Under the terms of the *Young v. County of Cook* settlement, the County agreed to pay \$55 million, and the Defendants also agreed to assign to the Class potential claims to additional monies from their insurers. Initial payments to the class members from the \$55 million fund were made with the understanding that litigation with the insurers would take time.
- You are receiving this notice because the parties recently settled the insurance litigation, and that settlement will provide additional money to the Class. If you submitted a valid claim form in the *Young v. County of Cook* settlement, you are also eligible to receive a share of the monies recently recovered from the insurers.
- You do not need to file a claim form or take any other action in order to receive a payment. The Claims Administrator will mail checks to everyone who is eligible.

Your Legal Rights and Options in this Settlement		
WHAT YOU CAN DO	WHAT IT MEANS	DEADLINE
Do Nothing	Receive a payment for your share of the money recovered from the insurers.	
Object	Remain a class member but write to the Court about why you don't like the Settlement and/or the amount of fees and expenses that Class Counsel asks the Court to award.	Received by: August 14, 2017

- Your legal rights and options, and the deadlines to exercise them, are explained below. Read this notice carefully.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

Basic Information

1. Why did I get this notice packet?

Records indicate that you submitted a valid claim form in *Young v. County of Cook*, No. 06-CV-552 (N.D. Ill.). The Court sent you this notice because you have a right to know about a proposed settlement of a related lawsuit in the Circuit Court of Cook County. That lawsuit was captioned as *County of Cook v. American International Group*, No. 12 L 2765 (Cir. Ct. Cook County, Ill.) and will be referred to in this notice as the *Young Insurance Litigation*. The purpose of this notice is to inform you about all of your options before the Court decides whether to approve the Settlement. If the Court approves it, and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the Settlement allows. This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The *Young Insurance Litigation* was filed on behalf of the class members (the "Class") who submitted claims in *Young v. Cook County* and against the following insurance companies and related entities: Illinois National Insurance Company, the Insurance Company of the State of Pennsylvania, Lexington Insurance Company, AIG Claims, Inc. (f/k/a Chartis Claims, Inc. and AIG Domestic Claims, Inc.), and AIG, Inc. The people who sued are called Plaintiffs, and the companies they sued are called the Defendants.

2. What is the *Young Insurance Litigation* about?

The *Young Insurance Litigation* involved allegations that Cook County was entitled to additional payments from the Defendants in relation to the *Young v. Cook County* lawsuit. As part of the settlement of *Young v. Cook County*, the County assigned certain claims to the class members. Class Counsel has handled the litigation against the insurers on behalf of the Class.

You may review and copy all of the *Young Insurance Litigation* pleading in person at the office of the Clerk of Circuit Court of Cook County, Richard J. Daley Center, 50 W Washington St., Chicago, IL 60602.

Questions? Call 1-800-315-2291 (toll-free) or 312-273-4088 (non-toll-free). Visit www.cookcountystripsearch.com

H00000

3. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to a settlement. Through a Settlement, the people affected will get compensation without the risk of further litigation. The Class Representatives and the attorneys think the Settlement is in the best interests of the Classes. This Settlement is subject to a Fairness Hearing described in Question 15.

Who Is in the Settlement

To see if you will get money from this Settlement, you first have to determine if you are a Class Member.

4. How do I know if I am part of this settlement?

You are a part of this settlement if you submitted a valid claim form in the *Young v. County of Cook* settlement, including everyone who received a payment in *Young v. County of Cook*. You are receiving this notice because our records indicate that you submitted a valid claim form in the *Young v. County of Cook* settlement.

5. What if I am still not sure if I am a class member?

If you are still not sure whether you are a class member, call 1-800-315-2291, visit www.cookcountystripsearch.com, or write to Young v Cook County II – 5614, PO Box 2599, Faribault, MN 55021-9599. If you write, include your name, gender, date of birth, and address. The Claims Administrator will help you find out whether you are a class member.

The Settlement Benefits – What You Get**6. What does the Settlement provide?**

The total settlement value is \$52 million, which will be distributed as follows: (a) \$32,500,000 represents a common fund for payments to class members, as well any fees and expenses awarded to Class Counsel and incentive awards to the Class Representatives for pursuing the assigned claims on behalf of the Class and any incentive awards for the Class Representatives; (b) \$8,666,666.67 is provided to the State of Illinois pursuant to the Illinois False Claims Act; and (c) \$10,833,333.33 million will be provided to Cook County.

7. How much money will I receive from the Settlement?

Persons who previously submitted a valid Claim Form in *Young v. County of Cook* will automatically receive a *pro rata* share of the \$32,500,000 common fund, after deducting costs of administering the settlement, as well as any court awarded fees and expenses of the attorneys who pursued the assigned claims for the Class and incentive awards to the Class Representatives. *Pro rata* means that the funds available to pay class members will be distributed evenly to all class members who qualify. The Settlement Agreement in *Young v. County of Cook* explains in further detail how payments will be calculated. To get a copy, go to www.cookcountystripsearch.com, or call 1-800-315-2291 (toll-free) or 312-273-4088 (non-toll-free) and ask for a copy.

How You Get a Payment**8. How do I request a payment?**

YOU DO NOT NEED TO TAKE ANY ACTION TO REQUEST A PAYMENT. Payments will be automatically issued to class members who are eligible to receive them. You must have submitted a valid Claim Form for payment from the \$55 million *Young v. County of Cook* fund to be eligible for a payment from the additional monies recovered from the insurers.

No payments will be sent until the Court approves the Settlement. Even then, there may be appeals relating to the Settlement. It is always uncertain how any appeals may be resolved and how long it will take. Please be patient.

Currently, the parties anticipate that there will be multiple distributions of funds if the Court approves the Settlement, as follows:

- a. **Payment One** will distribute the *pro rata* shares of the first \$19,500,000 of settlement payments in the *Young Insurance Litigation*.

Arden Lovett

Plaintiff

V

Defendant

Clair County

State Attorney Office

1) ON Oct. 30th, 2015 the St. Clair County State Attorney Office violated my civil rights when they denied me a preliminary hearing after being in custody for thirty days and not being officially indicted on case number CF-15-1181

2) The St. Clair County State Attorney Office violated my civil rights on July 14th, 2016 after I had requested and demanded a fast and speedy trial on March 14th, 2016. SEE court transcripts for August 11th, 2016

Next complaint

3) ON June 16th, 2017 the St. Clair County State Attorney Office violated my civil rights and the Freedom of Info. Act when they interfered with the process of justice.

4) The St. Clair County Sheriff Dept. which is in violation of my civil rights and the F.O.I.A. The ESCCSD didn't comply with the rule of law of the F.O.I.A. on June 2nd, 2017, when they turn my request over to the St. Clair County State Attorney Office who had nothing to do with this matter. SEE letter dated June 16th, 2017

- 4) ON JUNE 2nd, 2017 THE St. CLAIR County STATE ATTORNEY OFFICE AND THE St. CLAIR County Sheriff's Dept. WERE IN CONJUNCTION, AND ARE BOTH IN VIOLATION OF THE F.O.I.A., AND MY CIVIL RIGHTS. I SENT A REQUEST TO THE ESCCSA03 FOR A COPY OF THEIR INVESTIGATION UNDER THE F.O.I.A. BUT THE ESCCSA03 RESPONDED BY SENDING ME LESS THAN TEN PAGES OF AN INVESTIGATION THAT LASTED TWENTY ONE DAYS. SEE ATTACH LETTER
- 5) THE St. CLAIR County STATE ATTORNEY OFFICE KNEW THAT THE INFORMATION THAT THEY WERE SENDING ME ON JUNE 16th, 2017 WOULD BE OF LITTLE HELP IN CASE I WANTED TO SEEK SOME KIND OF LEGAL ACTION TOWARDS THE ESCCSA03 OR THE ESCCSA03 OR BOTH.
- 6) THE St. CLAIR County STATE ATTORNEY OFFICE IS IN VIOLATION OF THE F.O.I.A. BY NOT SENDING ME THE MOST IMPORTANT PIECE OF INFORMATION OF THE ESCCSA03 INVESTIGATION, WHICH WERE THE DEFRAUD AFFIDAVIT OF JARRETT K. NEFF. THE INACCURATE STATEMENTS AND INSUFFICIENT EVIDENCE THAT JARRETT K. NEFF SWORE TO BE TRUE, BUT LIED ABOUT ON SEPT. 29th, 2015 WILL SHOW, AND PROVE AND MAKE A PRIMA FACIE CASE OF MY CIVIL RIGHTS VIOLATION.
- 7) ON SEPT. 29th, 2015 JARRETT K. NEFF SWORE THAT I BROKE THE LAW THREE TIMES TO OBTAIN A SEARCH WARRANT FOR HIS AFFIDAVIT. THEN ON AUGUST 11th, 2016 HE SWORE THAT HE NEVER OBSERVED ME BREAK ANY LAW OR LAWS OF THE STATE OF ILLINOIS DURING HIS INVESTIGATION. TECHNICALLY I SHOULD HAVE BEEN VINDICATED ON AUGUST 11th, 2016, BUT THE WIDESPREAD CORRUPTION IN St. CLAIR County STATE ATTORNEY OFFICE REFUSE TO HONOR THE LAW.

Signed, Harding Lovett
 Date: Sept. 10th, 2017

BRENDAN F. KELLY

STATE'S ATTORNEY
ST. CLAIR COUNTY

10 PUBLIC SQUARE, 2nd FLOOR
BELLEVILLE, ILLINOIS 62220-1623

STEVEN R. SALLERSON
FIRST ASSISTANT



(618) 277-3892
FAX (618) 277-6748

06/16/2017

Mr. Harding Lovett #A90919
Menard Correctional Center
P.O. Box 1000 /MSU
Menard, IL 62259

Dear Mr. Lovett:

Thank you for writing to the St. Clair County Sheriff's Department with your request for documents pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq. On 06/02/2017, you requested the following documents: A copy of the investigation conducted between 9/9/15 and 9/29/15 concerning the requester.

Your request is granted in part and denied in part as follows. We will provide copies of your documents requested, however, these documents contain redactions of information that is considered: 5 ILCS 140/7 (1)(b), Private Information

You have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a). You may file your Request for Review with the PAC by writing to:

Public Access Counselor
Office of the Attorney General
500 South 2nd Street
Springfield, Illinois 62706
Fax: 217-782-1396
E-mail: publicaccess@atg.state.il.us

You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court. 5 ILCS 140/11. If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial letter. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and this denial letter when filing a Request for Review with the PAC.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Murley".

Sean Murley
Assistant State's Attorney
FOIA Officer

*THE ST. CLAIR COUNTY SHERIFF, AND THE ST. CLAIR COUNTY
STATE ATTORNEY VIOLATED MY CIVIL RIGHTS, AND THE FOURTH,
FOURTEEN AMENDMENT OF THE UNITED STATES CONSTITUTION AND
ARTICLE I SECTION 6 OF THE IL STATE CONSTITUTION.*